

[ ] EXPEDITE

[ ] Hearing is set

Date:

Time:

Judge/Calendar:

øšöö  
ēēāīūāēēāíāēē  
šōōūwvŷ  
ùwòùwūāuwāöšös  
özšöö  
ôëùâäöēēīēēàöē

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON

**IN AND FOR THE COUNTY OF KING**

ROBERT PETERSON, an individual,

Plaintiff,

Case No.:

VS.

## COMPLAINT FOR PERSONAL INJURIES AND NEGLIGENCE

BERKLEY NORTH PACIFIC, dba  
CONTINENTAL WESTERN INSURANCE  
COMPANY,

Defendant.

COME NOW the Plaintiff, Robert Peterson, for his cause of action against the Defendant, Berkley North Pacific doing business as Continental Western Insurance Company and its affiliates (herein after “Berkley”), allege and complain as follows:

I.

That at all times material hereto Plaintiff Robert Peterson was a resident of Brier, Snohomish County, Washington.

II.

That at all time material hereto Berkley was licensed to engage in the insurance business within the State of Washington and did in fact engage in the business of insurance herein.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

III.

That at all times material hereto Defendant Berkley had in full force and in effect its automobile insurance policy which provided underinsured/uninsured motorist coverage to Plaintiff Robert Peterson.

IV.

That on or about April 18, 2014, Plaintiff Robert Peterson was traveling NE Bothell Way at the 6700 Block as a passenger. Plaintiff's vehicle slowed and came to a complete stop for a red light. As Plaintiff started moving forward, they were rear-ended by a vehicle. The driver of said vehicle is unknown as they drove away. The collision occurred in Kenmore, King County, Washington. The at fault vehicle identity is unknown.

V.

That as a result of the aforementioned impact Plaintiff Robert Peterson sustained injuries and damages. The injuries and damages were a proximate result of the tortious conduct of the unknown driver.

VI.

That at all times material hereto, Plaintiff Robert Peterston was entitled to benefits under the underinsured/uninsured motorist coverage issued to him by Berkley.

VII.

The Plaintiff Robert Peterson has sustained bodily injuries resulting to include, but not limited to pain and suffering, aggravation and inconvenience, emotional distress and disturbance, and physical impairment entitling him to recover general damages in amounts not precisely known, the exact amounts to be proven at or before the time of trial.

VIII.

The Plaintiff Robert Peterson has sustained past and future medical expenses and other expenses, entitling him to recover general damages in amounts not precisely known, the exact amounts to be proven at or before the time of trial.

IX.


The Plaintiff Robert Peterson has sustained wage loss, loss of earning capacity and other economic losses, entitling him to recover general damages in amounts not precisely known, the exact amounts to be proven at or before the time of trial.

WHEREFORE, Plaintiffs pray for relief as follows:

1. For all of Plaintiffs' special damages and general damages to be shown at the time of trial;
2. For Plaintiffs' costs, disbursements and attorney's fees incurred herein;
3. For Plaintiffs' statutory costs, disbursements and attorney's fees incurred herein;
4. For any and all prejudgment interest which the Court may impose on any judgment awarded to Plaintiffs at the time of trial; and
5. For such other and further relief as the Court may deem just and equitable in the premises.

DATED: 4-9 2020.

Jack W. Hanemann, P.S.

  
\_\_\_\_\_  
JACK W. HANEMANN, WSBA #6609  
Attorney for Plaintiffs